

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

HANKOOK TIRE AMERICA
CORPORATION

vs.

CARRIER TRANSPORT, INC.

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C.A. NO. H-09-3886
JURY DEMAND

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, CARRIER TRANSPORT, INC. ("Carrier"), one of the Defendants in the above entitled and captioned cause, and would file Defendant's Original Answer showing as follows:

I.

This Defendant has insufficient information to admit or deny the allegations set forth in paragraph 1 of Plaintiff's Original Complaint. Therefore, said paragraph is denied in its entirety.

II.

Defendant admits the allegations contained in paragraph 2 of Plaintiff's Original Complaint.

III.

This Defendant has no basis to deny the allegations contained in paragraph 3 of Plaintiff's Original Complaint relating to venue.

IV.

This Defendant has insufficient information to admit or deny the allegations set forth in paragraph 4 of Plaintiff's Original Complaint. Therefore, said paragraph is denied in its entirety.

V.

This Defendant admits it is a Texas Corporation as stated in paragraph 5 of Plaintiff's Original Complaint.

VI.

This Defendant has insufficient information to admit or deny the allegations set forth in paragraph 6 of Plaintiff's Original Complaint. Therefore, said paragraph is denied in its entirety.

VII.

This Defendant denies the allegations as set forth in paragraph 7 of Plaintiff's Original Complaint.

VIII.

This Defendant denies the allegations set forth in paragraph 8 of Plaintiff's Original Complaint.

IX.

This Defendant denies the allegations set forth in paragraph 9 of Plaintiff's Original Complaint.

X.

Defendant has insufficient information upon which to base an admission or a denial, as to whether or not Plaintiff owned the cargo, therefore, same is denied.

XI.

Defendant specifically denies that Plaintiff is entitled to any and all relief sought by way of the *ad damnum* and prayer for relief contained in Plaintiff's Complaint.

XII.

Defendant asserts statute of limitations as an affirmative defense.

XIII.

Defendant demands a trial by jury.

WHEREFORE, PREMISES CONSIDERED, Defendant, Carrier Transport, Inc. respectfully request the Court deny Plaintiff's claims for relief for any further legal or equitable relief to which they may be justly entitled.

Respectfully submitted,

TEKELL, BOOK, ALLEN & MORRIS, L.L.P.



GREGORY A. HOLLOWAY

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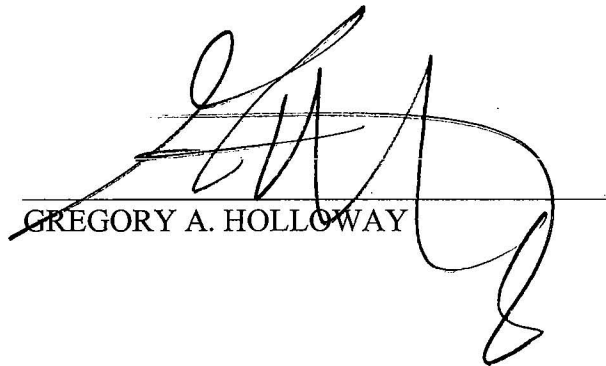
Facsimile: (713) 655-7727

ATTORNEYS FOR DEFENDANT,
CARRIER TRANSPORT, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this the 1st day of February, 2010, true and correct copies of the foregoing instrument were e-filed with the Court and copied to all counsel of record:

Robert C. Oliver
Sharpe & Oliver, L.L.P.
550 Westcott, Suite 230
Houston, Texas 77007-5096



A handwritten signature in black ink, appearing to read 'G. Holloway', is written over a horizontal line. Below the line, the name 'GREGORY A. HOLLOWAY' is printed in a sans-serif font.

GREGORY A. HOLLOWAY